## WESTERN INSPIRATIONAL BROADCASTERS, INC.

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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

## RE: FIFTH REPORT AND ORDER, FOURTH FURTHER NOTICE OF PROPOSED RULEMAKING AND FOURTH ORDER ON RECONSIDERATION

Western Inspirational Broadcasters, Inc (WIBI) offers its comments on the Fifth Report and Order, Fourth Further Notice of Proposed Rulemaking and Fourth Order on Reconsideration (hereinafter the "NPRM"). WIBI offers comments specifically regarding the Fourth Further Notice of Proposed Rulemaking section A.3 of the document, entitled: Translator Input Signals Complaint Procedure.

WIBI is persuaded that the method proposed by the Commission in paragraphs 44-46 used to mitigate interference to translator inputs by third-adjacent signals of LPFM facilities is acceptable. Furthermore, in response to paragraph 46, WIBI submits that third adjacent input protection should be equally applied to translators which receive third-adjacent channel FM Translator signals off-air as that of translators which receive their input from full service FM Stations.

With the increase of frequency congestion in both the reserved and non-reserved FM band WIBI has found that in order to obtain a reliable input signal to many translators, these translators must be fed off-air via a FM Translator facility and not the originating FM Station. WIBI would like to bring attention to the fact that this is generally only an issue in the case of a translator in the non-reserved portion of the band. Since FM translators in the reserved band are allowed to utilize alternate means such as Satellite, Microwave, or Internet (IP), troublesome off-air feeds can be easily remedied. The Commission does not have provisioning in the rules to allow for translators in the non-reserved band to take advantage of an alternate feed method as is allowed in the reserved portion of the FM Broadcast band.

It is WIBI's belief that translator off-air inputs must be protected to third-adjacent interference from a LPFM facility both when receiving an off-air signal of a Full Service FM facility and when receiving an off-air signal from a FM Translator facility. The proposed methods defined in paragraphs 44 through 46 of the NPRM are adequate in accomplishing this task. However, WIBI suggests that modifying the current FM Translator rules to allow for alternate means of feeding translators in the non-reserved band may lead to more available FM channels for LPFM facilities while improving the options non-reserved band translator operators have for feeding FM Translator facilities.

WIBI proposes a modification to both the FM Translator rules and LPFM rules which would allow for FM Translator facilities in the non-reserved band to be fed by alternate means such as Satellite, Microwave, or Internet (IP) in order to reduce the need for LPFM facilities to protect translator inputs in some cases while also allowing for the potential of improving the quality of the input to many translator facilities. WIBI believes that LPFM facilities should retain the requirement to protect any translator input which is on record as being fed by off-air means. However, in order to allow for more potential LPFM channels and reduce restrictions on the locations of LPFM transmitter sites, the applicant for an LPFM facility should be allowed to obtain an agreement from any affected translator licensee that would release the LPFM applicant from the requirement to protect that particular FM Translator's off-air input. In order to make this feasible the FM translator licensee must then be allowed to feed their translator by alternate means.

Furthermore, WIBI submits that if the Commission were to provide provisioning for non-reserved band FM Translators to be fed by alternate means that many of the owners of these facilities would elect to do so on their own accord thus freeing up many translators from requiring off-air input protection by LPFM facilities. There are many advantages to being able to feed a FM Translator via Satellite, Microwave, or Internet (IP): 1) Better long term feasibility of the facility as you eliminate the threat of a new facility causing interference, 2) Better audio quality can be delivered to the translator facility, and 3) The reliability of the translator can be improved once it is not dependent on the reliability of the facility feeding it.

In summary WIBI believes that a modification of both the LPFM and FM Translator rules as described in the above comments would be mutually beneficial to both services and would be in keeping with the public interest. The benefits include the addition of available LPFM channels and potential transmitter locations for new LPFM facilities while giving FM Translator operators the ability to feed with alternate means allowing for improved quality and reliability of FM Translators.

Respectfully Submitted,

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Western Inspirational Broadcasters,

Inc.

(designated a corporate officer by

The Board of Trustees)